

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
SOUTHERN DIVISION

COMPEER FINANCIAL, PCA,  Plaintiff,  v.  SUNWOLD FARMS, INC., SUNTERRA FARMS IOWA, INC. and LARIAGRA FARMS SOUTH, INC.,  Defendants,  PIPESTONE MANAGEMENT II, LLC,  Receiver,  THE PORK GROUP, INC. AND TYSON FRESH MEATS, INC.,  Intervenors.	4:25-cv-04044  <b>AFFIDAVIT</b>
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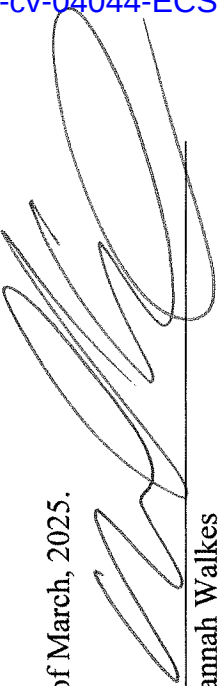
COMES NOW Hannah Walkes, being first duly sworn upon her oath, and states as follows:

1. I am the President of Pipestone Management II, LLC, the Receiver herein, and have personal knowledge of all matters stated herein.
2. On the morning of March 31, 2025, representatives of the Receiver went to offices of Sunterra Farms Iowa, Inc., which are located in Beresford, South Dakota, to gather information necessary to the receivership.
3. At approximately 10:30 a.m. on March 31, 2025, we were reviewing financials with Sunterra employees on their online accounting platform, namely Citrix Activity Manager (hereinafter “Citrix”).
4. While logged into the system and working to retrieve data, we noticed that all information regarding accounts receivable, accounts payable, and the general ledger were missing. After working in the system for a short period of time, we received a message


that we had been entirely kicked out of the accounting platform. After logging back into the system, all data on the accounting platform was missing, including data that was previously accessible, such as bank reconciliations.

5. I have serious concerns that the data is being destroyed or manipulated.
6. Access to the accounting platform and all data contained therein has not, as of this filing, been re-established.

Dated at Brandon, South Dakota, this 31<sup>st</sup> day of March, 2025.

  
Hannah Walkes

Subscribed and sworn to before me  
this 31<sup>st</sup> Day of March, 2025.

  
Notary Public – South Dakota,  
My Commission Expires: 8/9/2028

